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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

* * * *

UNITED STATES OF AMERICA,

Case No.: 2:19-cv-01986-GMN-DJA

Plaintiff,

**JOINT MOTION TO EXTEND DEADLINE
FOR DEFENDANTS JPMORGAN CHASE
BANK, N.A., AND CHASE MORTGAGE
COMPANY TO RESPOND TO PLAINTIFF'S
COMPLAINT (SECOND REQUEST)**

JEFFREY A. MARTINEZ, individually, and as Trustee of the Martinez Family Trust; DOLORES M. MARTINEZ, individually and as Trustee for the Martinez Family Trust; THE MARTINEZ FAMILY TRUST; MARTINEZ & ASSOCIATES, INC. (NV20041370692); MARTINEZ & ASSOCIATES INC. (NV20181033912); SIERRA MORTGAGE CORPORATION; FIDELITY NATIONAL TITLE; CHASE MORTGAGE COMPANY; JP MORGAN CHASE BANK NATIONAL ASSOCIATION; NEVADA MORTGAGEE ASSISTANCE COMPANY, LLC; THE COOPER CASTLE LAW FIRM, LLP; RHODES RANCH ASSOCIATION; and REPUBLIC SILVER STATE INC., DBA REPUBLIC SERVICES.

Defendants.

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1 IT IS HEREBY AGREED by and between Plaintiff UNITED STATES OF AMERICA
2 (hereafter “Plaintiff”) through its attorney E. Carmen Ramirez, and Defendants JPMORGAN
3 CHASE BANK, N.A. and CHASE MORTGAGE COMPANY, (collectively “Chase”) through
4 their attorney Justin T. Grim, Esq., that Defendants Chase may have additional time within
5 which to answer or otherwise respond to Plaintiff’s Complaint. Specifically, the parties have
6 agreed to extend Defendants’ time to respond. Defendants may answer or otherwise respond to
7 Plaintiff’s Complaint on or before February 21, 2020.

8 The parties further agree that good cause exists for this extension. The amended response
9 deadline allows Defendants to continue investigating the matter and for the parties to continue
10 their discussions regarding the dispute.

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1 Therefore, Plaintiff and Chase hereby jointly move for an order extending Chase's deadline
2 to answer or otherwise respond to Plaintiff's Complaint on or before February 21, 2020.

3 Signed this 29th day of January, 2020 Signed this 29th day of January, 2020

4 McCALLA RAYMER LEIBERT
5 PIERCE, LLP

RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General

6 By: /s/ Justin T. Grim
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10 By: /s/E. Carmen Ramirez
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12 Of Counsel:

13 NICHOLAS A. TRUTANICH
United States Attorney

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17 **IT IS SO ORDERED:**

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Daniel J. Albregts
United States Magistrate Judge

22 Dated: January 31, 2020.